

ADRIAN A. ELLIS, L.L.C.

26 Court Street,
Suite 1600
Brooklyn, New York 11242

TELEPHONE: (718) 596-1308/2865/5842

TELECOPIER: (718) 596-8059

E-MAIL: aellis@ellisgrouplaw.com

Adrian A. Ellis, Esq.

March 19, 2018

United States District Court
Hon. Andrew L. Carter, Jr.
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007
Via ECF and email: ALCARTERNYSDChambers@nysd.uscourts.gov

Re: Ali v. Lawrence K. Marks, et al
Civ. Case No.: 16-cv-01994 (ALC)

Dear Judge Carter:

I am the attorney for the plaintiff, Eric Ali, who has brought this action alleging a violation of his civil rights whilst in custody. I am respectfully requesting, with the consent of the defense, an order allowing for the filing of a third amended complaint.

The third amended complaint would substantively mirror the second amended complaint and would simply substitute currently named John Doe with the name of the recently identified officers. Additionally, the third amended complaint's causes of actions will be consistent with the Court's order dated March 14, 2018 dismissing from the plaintiff's complaint the conspiracy to deprive plaintiff of his right to be free from deliberate indifference cause of action.

If the Court grants the within application the defense has requested that it be allowed thirty (30) days in which to interpose an answer for the defendant(s) assuming a request for representation from the served parties is received by the New York Attorney General's office. The plaintiff consents to the defense's portion of this application.

Very truly yours,



Adrian A. Ellis

AAE:KB
Michael Siudzinski, A.A.G.